

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

ARTHUR D. KNIGHT,	)	
	)	Civil Case No. 4:18-cv-140
Plaintiff,	)	
v.	)	
	)	Circuit Court of Clay County, Missouri
GREAT LAKES and	)	Case No. 18CY-CV00775
UNITED STATES DEPARTMENT	)	Division 3
OF EDUCATION,	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1442(a)(1), 1444 and 1446, Defendant the United States of America, removes this action from the Circuit Court of Clay County, Missouri, to the United States District Court for the Western District of Missouri, and in support of this removal states as follows:

1. On or about January 18, 2018, Plaintiff Arthur D. Knight filed a PETITION FOR OTHER EXTRAORDINARY REMEDY in the Circuit Court of Clay County, Missouri, commencing a civil action against Great Lakes and United States Department of Education, Case No. 18CY-CV00775 (the State Court Action), requesting his student loan payments and student loan debt be eliminated. A copy of Plaintiff's PETITION FOR OTHER EXTRAORDINARY REMEDY<sup>1</sup> filed in the State Court Action is attached hereto as **Exhibit A**.

2. In the PETITION, Plaintiff makes classic, nonsensical sovereign citizen statements (referencing, among other items, the Gold Repeal Act of 1933) claiming he no longer owes defendant Great Lakes and the United States Department of Education money for his student

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<sup>1</sup> Plaintiff's petition, filed in state court, contained personal and financial information. To comply with the Privacy Act, those portions of plaintiff's petition, attached as Exhibit A, have been redacted.

loans because he provided an account statement coupon, which is legal tender, that must be “allonged to state: Pay to the order of United States in Rem as an implied constructive trust . . .” Plaintiff further states he filed a Uniform Commercial Code Financing statement to secure an interest in the negotiable instrument on that account. Finally, Plaintiff claims the United States failed to negotiate his alleged allongment, thus eliminating his debt.

3. Plaintiff does not assert a cause of action under the Missouri law, except by referencing R.S.Mo. Section 400.3-306,<sup>2</sup> purportedly attempting to justify his sovereign citizen claims; rather, he cites to numerous federal statutes.

4. As such, the State Court Action lies within the exclusive jurisdiction of the federal district courts, 28 U.S.C. §§ 1346(a)(2), 1346 (b)(1), and is immediately removable to the federal district courts. 28 U.S.C. § 1442(a)(1).

5. Accordingly, pursuant to 28 U.S.C. §§ 1441, 1442 and 1446, this case is hereby removed to the United States District Court for the Western District of Missouri and said Court now has jurisdiction over this action.

6. Furthermore, inasmuch as the State Court Action was filed in Clay County, Missouri, this case must be removed to the Western Division of the United States District Court for the Western District of Missouri. 28 U.S.C. §§ 105(b)(4), 1446(a).

7. A copy of a WRITTEN NOTICE OF FILING OF REMOVAL, directed to the Plaintiff is attached as **Exhibit B**. The WRITTEN NOTICE OF FILING OF REMOVAL will be filed promptly with the state court after the filing of this pleading.

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<sup>2</sup> This Missouri statute relates to a Holder in Due Course of a Promissory Note and Promissory Note Enforcement. Plaintiff improperly cites this statute because the financial documents he references in his civil action are bogus and not real documents or they are illegitimate filings; therefore, they cannot be used to satisfy his debt.

WHEREFORE, the United States of America, as the real party in interest of the named defendant United States Department of Education, requests the United States District Court for the Western District of Missouri, Western Division, forthwith assume full jurisdiction over the cause as provided by law.

Respectfully submitted,

Timothy A. Garrison  
United States Attorney

By: /s/ Jane Pansing Brown  
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ATTORNEYS FOR DEFENDANT  
UNITED STATES OF AMERICA

**CERTIFICATE OF SERVICE**

The undersigned Assistant United States Attorney hereby certifies that a true and correct copy of the foregoing NOTICE OF REMOVAL was electronically filed with the Clerk of the Court using the CM/ECF system on this 22<sup>nd</sup> day of February, 2018. The undersigned Assistant United States Attorney further certifies that a true and correct copy of the foregoing Notice of Removal to Federal Court was sent via United States mail, first class, postage prepaid, to the following non-ECF participant:

Arthur D. Knight  
1824 Beagle Court  
Liberty, MO 64068  
Pro Se Plaintiff

**/s/ Jane Pansing Brown**  
Jane Pansing Brown  
Assistant United States Attorney